U.S. Department of Justice

United States Attorney
Eastern District of New York

DMP:ICR/NJM
F. #2015R01787

271 Cadman Plaza East
Brooklyn, New York 11201

May 22, 2017

By Hand and ECF

Robert J. Cleary, Esq.
Dietrich L. Snell, Esq.
Proskauer Rose LLP
11 Times Square
New York, NY 10036

Re: United States v. Dan Zhong
Criminal Docket No. 16-614 (DLI)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes discovery with respect to the above-referenced matter, some of which has been designated "Sensitive Discovery Material" under the terms of the Protective Order dated February 22, 2017 (Dkt. No. 37) (the "February 22 Order"). This disclosure supplements the government's earlier disclosure under cover of letter dated February 15, 2017. The government renews its request for reciprocal discovery from the defendant.

Enclosed are the following:

- Records of the United States Department of State regarding visas issued to employees of China Rilin Construction (Group) Co. Ltd., which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ017170-DZ017889);

- Records from the United States Department of Homeland Security, Customs and Border Protection ("CBP"), which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ017890-DZ018053);

- Records from the United States Department of State reflecting information pertaining to visa applicants sponsored by Dan Zhong and Landong Wang, which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ018054);

- Records of the Home Depot, Inc. (DZ018055-DZ018072);

- Records of Citibank, N.A. which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ018073-DZ019744);

- Records of JPMorgan Chase, N.A. and Chase Bank USA, N.A. which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ019745-DZ028029);

- Records of Bank of America, N.A. which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ028030);

- Records of E-Trade Financial Corp. which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ028031-DZ028037);

- Records of Home Depot Credit Services which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ028038-DZ028864);

- Records of the Bank of China which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ028865-DZ030573);

- Correspondence from counsel for entities affiliated with Liaoning Rilin Construction, (Group) Co., Ltd. (the “Rilin Entities”) regarding document productions (RILIN000065-RILIN000066); and

- Documents provided by the Rilin Entities, Bates numbered WLE 0055491-WLE 0063923 and USRE 0064131-USRE 0066363.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

BRIDGET M. ROHDE
Acting United States Attorney

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Douglas M. Pravda
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Enclosures (DZ017170-DZ030573)
(RILIN000065-RILIN000066)
(USRE0064131-USRE0066363)
(WLE0055491-WLE0063923)

cc: Clerk of the Court (DLI) (by ECF) (without enclosures)